

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

---

Investigation by the Department on its own motion, )  
pursuant to G.L. c.159 § § 12 and 16, into the )  
collocation security policies of Verizon New )  
England Inc. d/b/a Verizon Massachusetts )

---

**D.T.E. 02-8**

**VERIZON MASSACHUSETTS' REPLY TO MOTIONS TO COMPEL**

In this Reply, Verizon Massachusetts (“Verizon MA”) responds to Motions to Compel filed by Allegiance Telecom of Massachusetts, Inc. (“Allegiance”) and XO Massachusetts, Inc. (“XO”). The data requested by Allegiance and XO consist of floor plans for each Massachusetts central office (“CO”), as well as the costs associated with Verizon MA’s proposed security plan. As stated below, that data is irrelevant, immaterial and beyond the scope of this proceeding. Moreover, the data requested are not readily available, and it would be unduly burdensome, unnecessary and unreasonable to require that Verizon MA develop such materials. Accordingly, for these reasons, those Motions to Compel should be denied.

**ARGUMENT**

Allegiance Information Request No. 1-1 (“AL-VZ 1-1”):

In AL-VZ 1-1, Allegiance seeks redacted copies of Verizon MA’s floor plans for all collocated COs. Allegiance Motion, at 5-6. Contrary to Allegiance’s claims, that data is not relevant to this proceeding. Moreover, as explained below, the data is not readily available in the form requested.

In support of its Motion, Allegiance cites to Verizon MA's statement in its Panel Testimony filed on April 5, 2002, that its "proposed security measures and enhancements are necessary because of the present network architecture and configuration of equipment and facilities in Verizon MA's COs and RTs [remote terminals]." Verizon MA Panel Testimony, at 5. Allegiance takes this statement completely out of context, and contends erroneously that the production of floor plans for all Verizon MA's collocated COs is warranted. Allegiance Motion, at 5-6. It is not.

Verizon MA's collocation security proposal requires that all physical collocation arrangements<sup>1</sup> be located in separate and secured space from Verizon MA's equipment and facilities. This means that if Verizon MA's proposal were approved, any existing physical collocation arrangements that are not in separate and secured space would be relocated, if feasible, or converted to virtual collocation. Verizon MA Panel Testimony, at 4, 27-31.

Currently, all existing caged and SCOPE arrangements in Massachusetts are located in separate and secured CO space and, therefore, they would require no change as a result of the Department's approval of Verizon MA's collocation security proposal.<sup>2</sup> In addition, there are presently no collocation arrangements at RTs in Massachusetts. Verizon MA's Panel Testimony, at 35-36. Likewise, under its collocation security proposal, Verizon MA would provide collocated carriers with reasonable access to common areas, such as temporary staging areas and loading docks, by continuing to coordinate pre-

---

<sup>1</sup> This would include traditional "caged" physical collocation, secured collocation open environment ("SCOPE"), and cageless collocation open environment ("CCOE").

<sup>2</sup> The only exception would be those physical collocation arrangements situated in "critical offices." Under Verizon MA's proposal, once a determination is made that a CO is "critical" for security reasons, then *only* virtual collocation should be permitted in that CO, and all physical collocation arrangements should be converted to virtual - regardless of whether the existing physical collocation arrangements are or can be located in separate and secured space. Verizon MA's Panel Testimony, at 39-40.

arranged access, at the carriers' expense, to those common areas for the delivery and unpacking of collocated carrier's equipment in any given CO. Verizon MA Panel Testimony, at 35.

Initially, Verizon MA identified a total of 13 existing CCOE arrangements in nine COs that would need to be relocated – or converted to virtual collocation – because they were not currently in separate and secured space. Verizon MA Panel Testimony, at 33. However, Verizon MA has since determined that only one physical collocation (CCOE) arrangement remains in Massachusetts that is in unsecured space. Because of the lack of available space in that CO (*i.e.*, Hopkinton CO), that CCOE arrangement cannot be rearranged and, thus, must be converted to virtual collocation under Verizon MA's collocation security proposal. See Verizon MA's Replies to Conversent 1-20, Allegiance 1-9, and Allegiance 1-21 (Supplemental).

In response to Allegiance's Motion, Verizon MA would agree to provide a redacted version of its floor plan for the Hopkinton CO - where the one unsecured CCOE arrangement exists - under a protective agreement.<sup>3</sup> Verizon MA, however, objects to Allegiance's broader request for the production of all other CO floor plans because, as explained above, no relocation or rearrangement of *existing* physical collocation arrangements in any other Massachusetts COs would be required if Verizon MA's collocation security proposal is adopted.

Should Verizon MA determine that *future* physical collocation requests cannot be fulfilled due to space constraints, *e.g.*, lack of separate and secured space, the Company would notify the

---

<sup>3</sup> This redacted version would remove the name of the collocated carrier, which is competitively sensitive information and not publicly available. This is consistent with Verizon MA's longstanding practice regarding disclosure of floor plans to the Department in notification filings when the Company cannot accommodate a physical collocation request because of space exhaust at a particular CO. In such filings, Verizon MA refers to existing and requesting collocated carriers anonymously and provides the Department only with available CO floor plans or diagrams on a proprietary basis. See DTE Tariff No. 17, Part E, Sec. 2.4.2.C.

Department in accordance with current requirements. *See* DTE Tariff No. 17, Part E, Sec. 2.4.2.C. Verizon MA would also provide a no-cost tour of the CO with space limitations to carriers upon request.<sup>4</sup> *See* DTE Tariff No. 17, Part E, Sec. 2.4.2.B. Accordingly, Allegiance's request that Verizon MA produce the floor plans of all collocated Massachusetts COs - or alternatively provide tours of all those COs – is inappropriate and unreasonable. Allegiance Motion, at 5-6. To the extent that such request is allowed at all, it should be limited only to the Hopkinton CO, where a single CCOE arrangement would need to be converted to virtual collocation under Verizon MA's collocation security proposal.

Further, the Department should deny Allegiance's request for the production of all of Verizon MA's CO floor plans because the data is not available in the form requested. The existing floor plans for Verizon MA's 169 collocated COs identify each collocated carriers' equipment and facilities, as well as that of Verizon MA. To redact the carriers' identity in all those CO floor plans is a substantial, manual work effort that is clearly outweighed by the lack of relevance of this data, as discussed above.

In addition, Verizon MA's existing CO floor plans are not drawn based on a uniform scale or measure. Thus, even if redacted CO floor plans were readily available, the use of those diagrams to discern the relative distance between facilities, equipment, etc. located in the various collocated COs would be limited. Indeed, Verizon MA itself does not rely solely on existing CO floor plans in determining whether physical collocation space is available in a particular CO. Rather, Verizon MA conducts its own CO walk-through upon receipt of physical collocation requests. Accordingly, there is

---

<sup>4</sup> Although Verizon MA allows carriers to view the available CO floor plan on the Company's premises upon request, carriers are not provided copies.

no basis for Allegiance's unduly burdensome and unreasonable request, and its Motion should be denied.

Allegiance Information Request No. 1-5 ("AL-VZ 1-5") and XO Information Request No. 1-16 ("XO-VZ 1-16"):

In these requests, Allegiance and XO seek to compel cost data from Verizon MA relating to the implementation of its collocation security proposal. Allegiance Motion, 8; XO Motion, at 2. That request is inappropriate for two reasons.

First, in response to carriers' questions raised at the February 25<sup>th</sup> procedural conference, the Department indicated that costs would be considered in a subsequent phase of this proceeding. Tr. 1:14-15. No party objected to the Department's decision, and it is untimely and unfair for parties now to raise objections after Verizon MA has filed its direct testimony based on the Department's determination regarding the scope of this proceeding.

Second, Verizon MA has stated repeatedly that it has not conducted a cost study based on its specific collocation security proposal. To develop a cost study at this time would be premature and unproductive since costs are a function of the type of security plan adopted by the Department. As noted by Allegiance, Verizon MA has provided some security-related costs to the extent that they already exist. Allegiance Motion, at 9. For example, Verizon MA produced costs associated with the implementation and/or enhancement of its card reader access systems ("CRAS"). *See* Verizon MA's Reply to Qwest 1-22. Those estimated costs are readily available because Verizon MA is in the process of rolling out its deployment of CRAS in its collocated Massachusetts COs. Verizon MA should not, however, be required to develop costs that do not exist simply to respond to carriers' discovery requests.

Likewise, should the Department approve Verizon MA's proposal to designate certain COs as "critical offices, requiring virtual collocation only, the Company has indicated that it "will endeavor to transfer those [existing physical collocation] arrangements 'in-place,' thereby minimizing the costs passed on" to collocated carriers. Verizon MA Panel Testimony, at 40-41. However, since the critical offices have not been quantified, it is virtually impossible to determine the specific costs associated with that proposal. Accordingly, Allegiance and XO's request is premature and unreasonable, and Verizon MA urges the Department to reject their Motions.

### **CONCLUSION**

For the foregoing reasons, the Department should deny Allegiance and XO's Motions. The data that those carriers seek to compel are not readily available, and are irrelevant and beyond the scope of this proceeding. Therefore, the Department should find that Verizon MA's replies to those discovery requests are reasonable and appropriate, and no further responses are required.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorney,

---

Barbara Anne Sousa  
185 Franklin Street, Rm. 1403  
Boston, Massachusetts 02110-1585  
(617) 743-7331

Dated: May 20, 2002